

## REMARKS

Applicant respectfully requests reconsideration of the above referenced application as amended. Claims 8-15 remain in the application. Claims 1-7 have been canceled without prejudice in this action. Claims 16-20 had been previously canceled without prejudice.

### Claim Rejections - 35 U.S.C. § 103

Claims 8-15 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,085,415 issued to Gandhi et al. (*Gandhi*) in view of U.S. Patent No. 6,432,724 issued to Ahn et al. (*Ahn*). In response, Applicant respectfully traverses the rejection of said claims in view of the remarks that follow.

*Gandhi* discloses methods for the production of insulated, conductive through-features in conductive core materials for electronics packaging (see, Abstract). As Examiner notes in the Office Action, *Gandhi* mentions in passing the inherent electrical properties of a conductive substrate (col. 3, lines 35-43).

In contradistinction to *Gandhi*, claim 8, for example, includes the feature of:

wherein at least one of the electrically isolated regions of the metal substrate core is coupled with a digital ground of an integrated circuit chip

In this case, Applicant agrees with Examiner that the *Gandhi* reference fails to teach the required feature of at least one electrically isolated region of a metal substrate core being coupled with a digital ground of an integrated circuit chip (Office Action, page 4, line 1).

*Ahn* relates to silicon substrates used to create integrated circuits (see, for example, Abstract), and does NOT relate to metal substrate cores used in the packaging of integrated circuits. Since *Ahn* does not contain any teaching or suggestion of metal substrate cores, it cannot contain any teaching or suggestion of coupling with electrically isolated regions of a

metal substrate core. Therefore, *Ahn* cannot contain any teaching or suggestion of the required feature of at least one electrically isolated region of a metal substrate core being coupled with a digital ground of an integrated circuit chip.

Thus, in light of the foregoing, Applicant respectfully asserts that the *Gandhi* reference in view of the *Ahn* reference fails to render obvious that which is claimed in rejected claim 8. Accordingly, Applicant respectfully requests that the §103(a) rejection of claim 8 be withdrawn.

Applicant notes that rejected claim 12 enjoys claim features similar to that of rejected claim 8 and is, likewise, patentable over the cited references for at least reasons analogous to those presented above with respect to claim 8. Accordingly, Applicant respectfully requests that the §103(a) rejection of claim 12 be withdrawn.

Rejected claims 9-11 and 13-15 depend from patentable base claims 8 or 12. Thus, in addition to any independent basis for patentability, Applicant respectfully asserts that claims 9-11 and 13-15 are patentable over the *Gandhi* and *Ahn* references by virtue of at least such dependency. Accordingly, Applicant respectfully requests that the §103(a) rejection of such claims be withdrawn.

Furthermore, Applicant respectfully submits that the Office Action is not clear as to the basis for the rejection of claims 9-11 and 13-15, in particular, for example, the rejection of claim 9. The Action has failed to point out those elements of the *Gandhi* or *Ahn* references that support the rejection. Applicant notes that MPEP §706.02(a) requires the Examiner to particularly point out the basis for rejection to enable the Applicant to respond in kind. In this case, the Examiner has failed to meet this burden.

Claim 9 includes the feature of:

input and output signals of the integrated circuit chip routed through the electrically isolated region of the metal substrate core that is coupled with the digital ground of the integrated circuit chip

Examiner has failed to point to, and Applicant is unable to find, where in the *Gandhi* or *Ahn* references this feature is disclosed or suggested. Accordingly, Applicant respectfully requests that, to the extent the rejection is maintained, that the Examiner point to those elements of the reference that support the rejection.

Furthermore, Applicant is confused by some of the language contained in the Office Action, for example, on page 3, the second line from the bottom, "It is notice ...." To the extent Examiner has attempted to take official notice of anything in the Office Action, Applicant respectfully traverses such official notice and requests Examiner to cite a reference in support of his position.


**Conclusion**

For at least the foregoing reasons, Applicant submits that the rejection of claims 8-15 has been traversed. Furthermore, Applicant respectfully submits that claims 8-15 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,  
John Guzek, et al.

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